

**COUNT IV**

**Violation of RICO § 1962(d) for Conspiracy to Violate §1962(a)**

**Norex v. All Defendants Except Astons**

421. The allegations of the above paragraphs are incorporated herein as if set out in full.

422. Pursuant to the Illegal Scheme, the above Defendants conspired among themselves, and with others, to violate section §1962(a).

423. The above Defendants knowingly agreed among themselves to commit or participate in at least two Predicate Acts in furtherance of the Conspiracy.

424. Given the complexity and far-reaching nature of the Conspiracy, coupled with the number of instances in which the above Defendants engaged in the Predicate Acts alleged herein, the Predicate Acts committed by the above Defendants could not have been committed without coordination and agreement among the above Defendants to knowingly participate in the Conspiracy.

425. As a direct and proximate cause of the above conspiracy, Norex suffered damages in an amount in excess of \$500 million.

**COUNT V**

**Violation of RICO § 1962(d) for Conspiracy to Violate §1962(b)**

**Norex v. All Defendants Except Astons**

426. The allegations of the above paragraphs are incorporated herein as if set out in full.

427. Pursuant to the Illegal Scheme, the above Defendants conspired among themselves, and with others, to violate sections §1962(b).

428. The above Defendants knowingly agreed to commit or participate in at least two Predicate Acts in furtherance of the Conspiracy.

429. Given the complexity and far-reaching nature of the Conspiracy, coupled with the number of instances in which the above Defendants engaged in the Predicate Acts alleged herein, the Predicate Acts committed by the above Defendants could not have been committed without coordination and agreement among the above Defendants to knowingly participate in the Conspiracy.

430. As a direct and proximate cause of the above conspiracy, Norex suffered damages in an amount in excess of \$500 million.

**COUNT VI**

**Violation of RICO § 1962(d) for Conspiracy to Violate §1962(c)**

**Norex v. All Defendants**

431. The allegations of the above paragraphs are incorporated herein as if set out in full.

432. Pursuant to the Illegal Scheme, all Defendants conspired among themselves, and with others, to violate section §1962(c).

433. The above Defendants knowingly agreed to commit or participate in at least two Predicate Acts in furtherance of the Conspiracy.

434. Given the complexity and far-reaching nature of the Conspiracy, coupled with the number of instances in which the Defendants engaged in the Predicate Acts alleged herein, the Predicate Acts committed by the Defendants could not have been committed without coordination and agreement among the Defendants to knowingly participate in the Conspiracy.

435. As a direct and proximate cause of the above conspiracy, Norex suffered damages in an amount in excess of \$500 million.

WHEREFORE, Norex demands judgment against Defendants, as follows:

1. Compensatory damages in excess of \$500 million;
2. Treble damages RICO in excess of \$ 1.5 billion;
4. Costs and attorney fees under RICO;
5. Such other relief as is just and proper.

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